



Signed and Filed: August 2, 2024

A handwritten signature in black ink, reading "Dennis Montali", is positioned above the printed name of the judge.

DENNIS MONTALI  
U.S. Bankruptcy Judge

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Attorney for Creditor Charles Li

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

In Re:

LEGAL RECOVERY, LLC

Debtor,

Case No.: 24-30074

Chapter 11

**ORDER AUTHORIZING  
EXAMINATION OF AND  
PRODUCTION OF DOCUMENTS BY  
DEMAS YAN PURSUANT TO  
BANKRUPTCY RULE 2004**

This matter came before the Court without a hearing upon consideration of *Creditor Charles Li's Ex Parte Application for an Order Pursuant to Bankruptcy Rule 2004 Authorizing Examination and Production of Documents by Demas Yan, the Manager of Debtor Legal Recovery, LLC* (the "**Application**"). Based upon the Court's review of the Application, and good cause appearing therefore,

**IT IS HEREBY ORDERED** that

1. The Application is granted, and Creditor Charles Li may issue a subpoena pursuant to this order; and

1                   2.       Demas Yan shall appear for an oral examination on August 23,  
2   2024 at 10:00 a.m. and shall produce documents described below before close of business  
3   on August 19, 2024, or on such other dates as may be agreed to in writing between  
4   Charles Li and Demas Yan, with both the oral examination and the production to take  
5   place at the law offices of Duy Thai at Jan Brown & Associates, Court Reporters, 701  
6   Battery Street, San Francisco, California.

7                   **DOCUMENTS TO BE PRODUCED BY DEMAS YAN**

8                   **DEFINITIONS AND INSTRUCTIONS**

- 9                   A. “DEBTOR” means Legal Recovery, LLC.
- 10                  B. “YOU” and “YOUR” mean Demas Yan.
- 11                  C. “DOCUMENT” or “DOCUMENTS” is used in the broadest sense possible  
12   and includes, without limitation, any writings as defined by Rule 1001 of the Federal  
13   Rules of Evidence and electronically stored information as described by Rule  
14   34(b)(2)(E). In particular, “DOCUMENT” includes both originals and copies, as well as  
15   electronically stored information that is stored in any medium from which information  
16   can be obtained.
- 17                  D. “TRANSFER” means a transfer of cash or other property, including by means  
18   of check, wire transfer, debit or credit to an account, or the exchange of inventory or  
19   other property.
- 20                  E. Each request contained herein extends to any DOCUMENTS in YOUR  
21   possession, custody or control. A DOCUMENT is deemed to be in YOUR possession,  
22   custody or control, (1) if it is in YOUR physical custody, or (2) if it is in the physical  
23   custody of any other person and YOU (a) own such DOCUMENT in whole or in part; (b)  
24   YOU have a right by contract, statute or otherwise to sue, inspect, examine or copy such  
25   DOCUMENT on any terms; (c) YOU have an understanding, express or implied, that  
26   YOU may use, inspect, examine or copy such DOCUMENT on any terms; or (d) YOU  
27   have, as a practical matter, been able to use, inspect, examine or copy such DOCUMENT  
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1 when YOU have sought to do so. Such DOCUMENTS shall include, without limitation,  
2 DOCUMENTS that are in the custody of YOUR attorneys or other agents.

3 F. If a DOCUMENT exists only within the memory of a computer or computer  
4 disc, a copy of that data should be produced in machine-readable form (i.e., native  
5 format), and a “hard” copy of the DOCUMENT should be printed and produced, unless  
6 otherwise agreed to in writing between YOU and counsel for Creditor Charles Li.

7 G. Unless otherwise stated, all document requests are for the period of January 1,  
8 2019 through present.

### 9 **DOCUMENTS TO BE PRODUCED**

10 1. All DOCUMENTS relating to or constituting any operating agreements of  
11 DEBTOR.

12 2. All DOCUMENTS relating to the formation of DEBTOR.

13 3. All tax returns on which any income or expense for DEBTOR has ever  
14 been reflected.

15 4. All DOCUMENTS related to USA National Title Company Escrow No.  
16 182001923-JG.

17 5. All DOCUMENTS relating to communications or financial transactions  
18 with Meiling Fang.

19 6. All DOCUMENTS relating to any assignment of any asset by Meiling  
20 Fang to DEBTOR.

21 7. All DOCUMENTS relating to any interest Meiling Fang holds in  
22 DEBTOR.

23 8. All DOCUMENTS relating to communications or financial transactions  
24 with Tina Yan.

25 9. All DOCUMENTS relating to communications or financial transactions  
26 with Shuzhen Tu.

27 10. All DOCUMENTS relating to 689 13th Street, San Jose, California.

28 11. All DOCUMENTS relating to 1052 Noble Lane, San Jose, California.

- 1           12.     All DOCUMENTS relating to 547 23rd Avenue, San Francisco,  
2 California.
- 3           13.     All DOCUMENTS relating to Noble Lane LLC.
- 4           14.     All DOCUMENTS relating to Legal Associates, Inc.
- 5           15.     All DOCUMENTS relating to Legal Affiliates Inc.
- 6           16.     All DOCUMENTS relating to Apartments.com.
- 7           17.     All DOCUMENTS relating to CoStar.
- 8           18.     All DOCUMENTS relating to Cozy.
- 9           19.     All DOCUMENTS relating to a December 5, 2019 Zelle transaction from  
10 DEBTOR's Wells Fargo account no. ending in 8660 to Shuzhen Tu.
- 11          20.     All DOCUMENTS relating to a December 20, 2019 Zelle transaction  
12 from DEBTOR's Wells Fargo account no. ending in 8660 to Shuzhen Tu.
- 13          21.     All DOCUMENTS relating to a March 17, 2020 Zelle transaction from  
14 DEBTOR's Wells Fargo account no. ending in 8660 to Shuzhen Tu.
- 15          22.     All DOCUMENTS that relate to or reflect books and records of the  
16 DEBTOR in any format from January 1, 2019 through present, including, but not limited  
17 to all financial and accounting records, bank statements, cancelled checks, deposit tickets,  
18 and investment statements of the DEBTOR.
- 19          23.     All data in native format pertaining to the DEBTOR from any accounting  
20 system currently or previously maintained by the DEBTOR or anyone on behalf of the  
21 DEBTOR.

22                               **\*\* END OF ORDER \*\***

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